

City of Lakewood

Office of the City Clerk

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November 7, 2025

Catherine Kentner
9475 W. Cedar Ave.,
Lakewood, CO 80226

***Re: City Clerk's Determination of Validity of Complaint Filed Against Candidate Committee
Jeslin Shahrezaei for Lakewood, and the Subsequent Cure of Such Violation***

Ms. Kentner,

This office received your campaign finance complaint dated November 4, 2025 (the "Complaint"), alleging that the registered candidate committee, Jeslin Shahrezaei for Lakewood (the "Committee"), violated Sections 2.54.030(D)(2)(c), 2.54.030(D)(2)(d), and 2.54.030(D)(1)(b) of the Lakewood Municipal Code (the "Code") by accepting a \$400.00 contribution from Metro Housing Coalition. The Complaint alleges that this contribution violates Code section 2.54.030(D)(2)(c) because it is a contribution from a corporation. The Complaint further alleges that this contribution violates Code section 2.54.030(D)(2)(d) because it amounts to an anonymous contribution. Finally, the Complaint alleges that the contribution violates Code section 2.54.030(D)(1)(b) because it "lacks the required disclosure for a donation over \$100".

As the City Clerk, per Code section 2.54.050(B)(1), after a complaint is filed it is my responsibility to determine whether the complaint is valid. In this case, the determination of validity depends, pursuant to Code section 2.54.050(B)(1)(a-c) on whether the Complaint you filed: (a) was timely filed under this code; (b) specifically identifies one or more violations of this Code; and (c) alleges/contains sufficient facts to support a factual and legal basis for the finding of violations of law as alleged. I have determined that your Complaint, as relates to the alleged violation of Code section 2.54.030(D)(2)(c), satisfies the requirements of Code section 2.54.050(B)(1)(a-c). However, subsequent to the filing of your Complaint, the Committee filed an amended report that cures the alleged violations, and I will therefore not be referring the Complaint to an independent hearing officer, and am instead determining that **the non-compliance has been cured**, as discussed in detail below.

I. Determination of Validity Relating to Allegation of Violation of Code Section 2.54.030(D)(2)(c)

The Complaint first alleges that the Committee violated Code section 2.54.030(D)(2)(c) by accepting a \$400.00 contribution from Metro Housing Coalition, which is a corporation as defined by the Code.

Analysis of Code section 2.54.050(B)(1)(a): This section of Code provides: "A complaint is valid if it: (a) Was timely filed under this code;".

The Complaint alleges a violation relating to a contribution made on September 2, 2025. Pursuant to Code section 2.54.050(B)(1), a complaint alleging a violation of Chapter 2.54 of the Code must be filed with the "City Clerk no later than 120 days after the date of filing of the report containing the alleged violation." The City Clerk notes that the Committee filed the report relating to the contribution

from Metro Housing Coalition on September 15, 2025. The Complaint was therefore filed within 120 days of the date of filing of the report containing the alleged violation, thereby satisfying the requirements of Code section 2.54.050(B)(1)(a).

Analysis of Code section 2.54.050(B)(1)(b): This section of Code provides: “A complaint is valid if it: (b) Specifically identifies one or more violations of this code;”.

The Complaint alleges the Committee accepted a \$400.00 contribution from Metro Housing Coalition, which is a corporation as defined by the Code. Pursuant to Code section 2.54.030(D)(2)(c), “No candidate committee shall accept any contribution from any corporation or labor organization.”

Thus, the Complaint identifies an alleged violation of section 2.54.030(D)(2)(c), thereby satisfying the requirements of Code section 2.54.030(B)(1)(b).

Analysis of Code section 2.54.050(B)(1)(c): This section of Code provides: “A complaint is valid if it: (c) Alleges/contains sufficient facts to support a factual and legal basis for the finding of violations of law as alleged.

The Complaint provides information from the Colorado Secretary of State showing that Metro Housing Coalition (full name: Metro Housing Coalition-a Committee for Constructive Government), is a Nonprofit Corporation. Further, the Complaint correctly notes that the Code’s definition of “corporation” under section 2.54.020 includes non-profit corporations. Finally, the Complaint points out that the Committee reported a \$400.00 contribution made by Metro Housing Coalition on September 2, 2025.

Thus, the Complaint alleges sufficient facts to support a factual and legal basis for the finding of violations of law as alleged, and the City Clerk hereby deems the Complaint **valid**, as it pertains to the alleged violation of Code Section 2.54.030(D)(2)(c).

However, as required by Code section 2.54.050(B)(1), the City Clerk notified the Committee of the Complaint on November 5, 2025. On November 6, 2025, the Committee filed an amended report amending the name of the group that made the \$400.00 contribution on September 2, 2025, to Metro Housing Coalition Political Action Committee.

Pursuant to Code section 2.54.050(B)(2)(a), “When a person and/or group can cure its non-compliance due to an inadequate report or a failure to file a required report on an item thereon, the City Clerk shall accept an amended report or reports within three business days of notifying the parties that the complaint is valid.” Pursuant to Code section 2.54.050(B)(1), City Clerk was required to make the determination of validity by November 7, 2025. Thus, while the amended report was filed before the City Clerk issued the determination of validity, the filing of the amended report was made within three business days of the date the City Clerk was required to notify the parties that the complaint is valid, and the City Clerk therefore accepts the amended report and incorporates it into this determination of validity.

While Code prohibits candidate committees from accepting contributions from a corporation, pursuant to 2.54.030(A)(3), “During an election cycle, a candidate committee may accept no more than \$400.00 from any natural person or political committee for candidates for City Council...” Thus, Code section 2.54.030(A)(3) permits a candidate committee for a candidate for City Council, such as the Committee that is the subject of this Complaint, to accept up to a \$400.00 contribution from a political committee. The contribution that is the subject of the Complaint, was made in the amount of \$400.00. Because the Committee has amended its report to reflect that this contribution came from a political committee rather than a corporation the non-compliance has been cured as allowed by Code section

2.54.050(B)(2)(a). Pursuant to Code section 2.54.050(B)(2)(b), because the non-compliance has been cured, the City Clerk will not be referring the Complaint to an independent hearing officer and instead the matter is deemed cured.

PLEASE NOTE: Pursuant to Code section 2.54.050(A)(6), the City Clerk is obligated to:

Notify any person and/or group under their jurisdiction who has failed to fully comply with the provisions of this Code and notify any person and/or group if a complaint has been filed with the City Clerk alleging a violation of this Code. The Clerk shall notify, within three business days, of the person's or group's failure to complete the mandatory filing documents.

Upon the City Clerk's receipt of the Committee's amended report amending the contributor to Metro Housing Coalition Political Action Committee, the City Clerk recognized that while the Metro Housing Coalition Political Action Committee has registered with the Secretary of State as a Political Committee (and has reported its contribution to the Committee to the Secretary of State), it has failed to register as a Political Committee with the City Clerk as is required by Code section 2.54.030(H). Pursuant to the City Clerk's obligation under Code section 2.54.050(A)(6), on November 7, 2025, the City Clerk notified the Metro Housing Coalition Political Action Committee of its obligation to register as a political committee.

II. Determination of Validity Relating to Allegation of Violation of Code Section 2.54.030(D)(2)(d)

The Complaint also alleges that the Committee violated Code section 2.54.030(D)(2)(d) by accepting an anonymous contribution from Metro Housing Coalition.

Analysis of Code section 2.54.050(B)(1)(a): This section of Code provides: "A complaint is valid if it: (a) Was timely filed under this code;"

The Complaint alleges a violation relating to a contribution made on September 2, 2025. Pursuant to Code section 2.54.050(B)(1), a complaint alleging a violation of Chapter 2.54 of the Code must be filed with the "City Clerk no later than 120 days after the date of filing of the report containing the alleged violation." The City Clerk notes that the Committee filed the report relating to the contribution from Metro Housing Coalition on September 15, 2025. The Complaint was therefore filed within 120 days of the date of filing of the report containing the alleged violation, thereby satisfying the requirements of Code section 2.54.050(B)(1)(a).

Analysis of Code section 2.54.050(B)(1)(b): This section of Code provides: "A complaint is valid if it: (b) Specifically identifies one or more violations of this code;"

The Complaint alleges the Committee accepted an anonymous contribution. Pursuant to Code section 2.54.030(D)(2)(d):

No candidate may accept any contribution without reporting the identity of the contributor. No candidate may solicit anonymous contributions including any solicitation commonly referred to as "pass the hat" or "fishbowl" solicitation. Website contributions may be accepted if the contributor is properly identified.

Thus, the code prohibits anonymous contributions/contributions made without reporting the identity of the contributor. As such, the Complaint has specifically identified a violation of the code.

Analysis of Code section 2.54.050(B)(1)(c): This section of Code provides: “A complaint is valid if it: (c) Alleges/contains sufficient facts to support a factual and legal basis for the finding of violations of law as alleged.

The Complaint supports the alleged violation of 2.54.030(D)(2)(d) by saying that the \$400.00 contribution made to the Committee on September 2, 2025 “amounts to an anonymous contribution since no individuals with disclosures are listed.” Despite the Complaint claiming that the contribution is anonymous, the Committee’s report lists a specific entity that made the contribution: Metro Housing Coalition. The Complaint further references the Secretary of State’s registration information for Metro Housing Coalition, which means there was sufficient information in the report for this contribution to allow the general public to not only identify the group that made the contribution, but also to look the contributing group up via the Secretary of State to determine that it is a registered nonprofit corporation.

If the contribution were anonymous as alleged, the complainant would not have been able to provide sufficient information to allege that the contribution was illegally made by a corporation in violation of Code section 2.54.030(D)(2)(c). Moreover, the Candidate’s amended report now list the contributor as “Metro Housing Coalition Political Action Committee.” Thus, the amended report also provides sufficient identification of the contributor does not represent an anonymous contribution.

Therefore, the Complaint does not allege facts sufficient to support a factual and legal basis for the finding of a violation of Code section 2.54.030(D)(2)(d) and the City Clerk hereby dismisses this allegation as required by Code section 2.54.050(B)(2).

III. Determination of Validity Relating to Allegation of Violation of Code Section 2.54.030(D)(1)(b).

The Complaint additionally alleges that the Committee violated Code section 2.54.030(D)(1)(b) because it lacks the required disclosure for a “donation” over \$100.00.

Analysis of Code section 2.54.050(B)(1)(a): This section of Code provides: “A complaint is valid if it: (a) Was timely filed under this code;”.

The Complaint alleges a violation relating to a contribution made on September 2, 2025. Pursuant to Code section 2.54.050(B)(1), a complaint alleging a violation of Chapter 2.54 of the Code must be filed with the “City Clerk no later than 120 days after the date of filing of the report containing the alleged violation.” The City Clerk notes that the Committee filed the report relating to the contribution from Metro Housing Coalition on September 15, 2025. The Complaint was therefore filed within 120 days of the date of filing of the report containing the alleged violation, thereby satisfying the requirements of Code section 2.54.050(B)(1)(a).

Analysis of Code section 2.54.050(B)(1)(b): This section of Code provides: “A complaint is valid if it: (b) Specifically identifies one or more violations of this code;”.

The Complaint alleges the “Lakewood Municipal Code...requires disclosures for donations of \$100.00 or more.” Code section 2.54.030(D)(1)(b) provides:

Contributions over \$100.00. In the case of the aggregate contributions made to a political committee or issue committee during an election cycle, the disclosure required by this section shall also include the occupation and employer of each person and/or group who has made a contribution of \$100.00 or more to such committee.

Thus, in certain situations, the Code does require a report/disclosure to include the occupation and employer of each person/group who has made a contribution of \$100.00 or more. As such, the Complaint has specifically identified a violation of the code.

Analysis of Code section 2.54.050(B)(1)(c): This section of Code provides: "A complaint is valid if it: (c) Alleges/contains sufficient facts to support a factual and legal basis for the finding of violations of law as alleged.

The Complaint supports the alleged violation of 2.54.030(D)(1)(b)¹ by stating that the Code "requires disclosures for donations of \$100 or more" and that the Committee's report relating to the contribution at issue "lacks the required disclosure for a donation over \$100..." Code section 2.54.030(D)(1)(b), applies only to "contributions made to a political committee or issue committee during an election cycle." However, the Committee is a candidate committee, rather than a political or issue committee, and as such, Code section 2.54.030(D)(1)(b) is inapplicable to the Committee's reporting requirements. Thus, the Complaint does not allege facts sufficient to support a factual and legal basis for the finding of a violation of Code section 2.54.030(D)(1)(b) and the City Clerk hereby dismisses this allegation as required by Code section 2.54.050(B)(2).

Sincerely,



Jay Robb
City Clerk

¹ The City Clerk notes that the Complaint lists the Code section as 2.54.030(D)(1)(a) but then cites to the language of Code section 2.54.030(D)(1)(b). As such, the City Clerk's analysis of the violation is based upon the language of Code section 2.54.030(D)(1)(b).